

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT TACOMA**

CHAO CHEN, individually and on behalf of all those similarly situated,

Plaintiff,

V.

THE GEO GROUP, INC., a Florida corporation,

Defendant.

Case No.: 3:17-cv-05769

## **NOTICE OF APPEARANCE**

(Clerk's Action Requested)

**TO:** THE CLERK OF THE COURT

**AND TO: ALL PARTIES**

PLEASE TAKE NOTICE that JOAN K. MELL and the law firm III BRANCHES LAW, PLLC, appears for THE GEO GROUP, INC. in the above-entitled action. Said appearance is without waiver of any defenses including, without limitation, the defenses of:

1. Lack of Jurisdiction of Subject Matter;
  2. Lack of Jurisdiction over the Person;
  3. Improper Venue;
  4. Insufficiency of Process;

5. Insufficiency of Service of Process;
  6. Failure to State a Claim upon which Relief may be Granted; and,
  7. Failure to Join a Party.

**YOU ARE HEREBY FURTHER NOTIFIED** that all further papers and pleadings, except original process, shall be served upon the undersigned attorney at the address stated below.

Joan K. Mell  
III Branches Law, PLLC  
1019 Regents Boulevard, Suite 204  
Fircrest, Washington 98466  
Telephone: (253)-566-2510  
Facsimile: (281)-664-4643  
Email: joan@3brancheslaw.com

Dated this 28th day of September, 2017 at Fircrest, WA.

III Branches Law, PLLC

*Joan K. Mell*, WSBA #21319  
Attorney for The Geo Group, Inc.

## **CERTIFICATE OF SERVICE**

I, Joseph Fonseca, hereby certify as follows:

I am over the age of 18, a resident of Pierce County, and not a party to the above action. On September 28, 2017, I electronically filed the above Notice of Appearance, with the Clerk of the Court using the CM/ECF system and served via Email to the following:

ATTORNEY NAME & ADDRESS	METHOD OF DELIVERY
Schroeter, Goldmark & Bender Adam J. Berger, WSBA No. 20714 Lindsay L. Halm, wSBA No. 37141 Jamal N. Whitehead, WSBA No. 39818 810 Third Avenue, Suite 500 Seattle, WA 98104 <a href="mailto:berger@sgb-law.com">berger@sgb-law.com</a> <a href="mailto:halm@sgb-law.com">halm@sgb-law.com</a> <a href="mailto:whitehead@sgb-law.com">whitehead@sgb-law.com</a>	<input checked="" type="checkbox"/> CM/ECF E-Service <input checked="" type="checkbox"/> E-mail
The Law Office of R. Andrew Free Andrew Free P.O. Box 90568 Nashville, TN 37209 <a href="mailto:andrew@immigrationcivilrights.com">andrew@immigrationcivilrights.com</a>	
Sunbird Law, PLLC 1001 Fourth Avenue, Suite 3200 Seattle, WA 98154 <a href="mailto:devin@sunbird.law">devin@sunbird.law</a>	

I certify under penalty of perjury under the laws of the State of Washington that the above information is true and correct.

DATED this 28th day of September, 2017 at Fircrest, Washington.

~~Joseph Fonseca, Paralegal~~